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October 25, 1999

The Office of Special Nutritionals (HFS-450) Center for Food Safety and Applied Nutrition Food and Drug Administration 200 C. Street S.W. Washington, DC 20204

Dear Sir/Madam:

This is a notification pursuant to 21 U.S.C. 343(r)(6) that Standard Process Inc., Palmyra, Wisconsin 53156-0904, is making the following statements:

- (1) Maintains cellular health.
- The antigenic properties promote healthy cellular division, function, and growth. (2)
- The bovine thyroid PMGTM extract in Thytrophin PMG appears to neutralize the (3) circulating antibody, thereby contributing to the maintenance of cellular health.
- Thytrophin PMG improves calcium absorption. (4)
- Thytrophin PMG enhances metabolic efficiency. (5)
- Magnesium functions as a co-factor, assisting enzymes in catalyzing many chemical (6) reactions.
- Magnesium functions in such reactions as nerve conduction and nerve excitability; (7) transfer of energy, muscular activity; and many other specific processes. LET 4569
- Magnesium and calcium play an important role in human metabolism. (8)
- Thytrophin PMG supports the role of the thyroid in basal metabolism, its dynamic (9) relationships with other endocrine glands, and its vital role in the promotion of growth.
- Thytrophin PMG provides nutritional ingredients and support for the thyroid tissues. (10)

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These statements are made for a dietary supplement containing a proprietary blend of bovine thyroid PMGTM extract, and magnesium citrate. Other ingredients include calcium lactate, cellulose, and calcium stearate. The name of the product is Thytrophin PMG®.

The information contained herein is accurate and Standard Process Inc. has substantiation that the statements are truthful and not misleading.

Sincerely yours,

Ann Holden

Standard Process Inc.

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